

UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.<sup>1</sup>

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**MOTION SUBMITTING CERTIFIED TRANSLATIONS IN CONNECTION WITH  
DOCKETED CLAIM OBJECTION RESPONSES TO BE HEARD AT THE  
FEBRUARY 16-17, 2022 ADJOURNED OBJECTION HEARING**

To the Honorable United States District Judge Laura Taylor Swain:

The Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as the sole Title III representative of the Debtors pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”),<sup>2</sup> respectfully files this motion in compliance with the Court’s December 8, 2021 *Order Regarding Adjourned Omnibus*

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (“Commonwealth”) (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17- BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

<sup>2</sup> PROMESA is codified at 48 U.S.C. §§ 2101–2241.

*Objections to Claims* [ECF No. 19461] (the “Adjourned Objection Hearing Procedures Order”) directing the Oversight Board to file (i) any responses that were not filed on the docket and/or (ii) certified translations of any Spanish-language responses to claims that the Debtors intend to prosecute at the hearing to be held on February 16-17, 2022. *Adjourned Objection Hearing Procedures Order* at 2.

Attached hereto as **Exhibit 1** is a certified translation of the response [ECF No. 18290] (the “Feliciano Rosado Response”), filed by Maira Feliciano Rosado (“Feliciano Rosado”), to the *Three Hundred Sixty-Seventh Omnibus Objection (Non-Substantive) of the Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Employment-Related Claims Asserted Against the Incorrect Debtor* [ECF No. 17933] (the “Three Hundred Sixty-Seventh Omnibus Objection”).

Attached hereto as **Exhibit 2** is a certified translation of the response [ECF No. 18875] (the “López Báez Response”), filed by claimant Sonia N. López Báez (“López Báez”), to the *Three Hundred Sixty-Second Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Misclassified Claims* [ECF No. 17927] (the “Three Hundred Sixty-Second Omnibus Objection”).

Attached hereto as **Exhibit 3** is a certified translation of the response [ECF No. 18110] (the “Medina Serrano Response”), filed by claimant Zobeida Medina Serrano (“Medina Serrano”), to the *Three Hundred Seventy-Fourth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico, the Puerto Rico Sales Tax Financing Authority, the Puerto Rico Highways and Transportation Authority, the Employees Retirement System of the Government of the Commonwealth of Puerto Rico, and the Puerto Rico Public Buildings Authority to Late-Filed Claims* [ECF No. 17923] (the “Three Hundred Seventy-Fourth Omnibus Objection”).

Attached hereto as **Exhibit 4** is a certified translation of the response ECF No. 18159] (the “Martínez Colón Response”), filed by claimant Facunda Martínez Colón (“Martínez Colón”), in response to the Three Hundred Seventy-Fourth Omnibus Objection.

Attached hereto as **Exhibit 5** is a certified translation of the response [ECF No. 18165] (the “Gandia Response”), filed by claimant Myriam S. Gandia (“Gandia”), in response to (1) the Three Hundred Seventy-Fourth Omnibus Objection and (2) the *Three Hundred Eighty-First Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico, the Employees Retirement System of the Government of the Commonwealth of Puerto Rico, and the Puerto Rico Public Buildings Authority to Employee Claims Asserting Liabilities Owed By Entities That Are Not Title III Debtors* [ECF No. 17917] (the “Three Hundred Eighty-First Omnibus Objection”).

Attached hereto as **Exhibit 6** is a certified translation of the response [ECF No. 18166] (the “Lugo Santana Response”), filed by claimant Ines M. Lugo Santana (“Lugo Sanatana”), in response to the Three Hundred Seventy-Fourth Omnibus Objection.

Attached hereto as **Exhibit 7** is a certified translation of the *Reply to Three Hundred Seventy-Fourth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico, Puerto Rico Sales Tax Financing Authority, Puerto Rico Highways and Transportation Authority, Employees Retirement System of the Government of the Commonwealth of Puerto Rico, and Puerto Rico Public Buildings Authority to Late-Filed Claims* [ECF No. 18177] (the “Febo Vázquez Response”), filed by Nydia Febo Vázquez (“Febo Vázquez”), in response to the Three Hundred Seventy-Fourth Omnibus Objection.

Attached hereto as **Exhibit 8** is a certified translation of the response [ECF No. 18197] (the “Johnson Response”), filed by claimant Obe E. Johnson (“Johnson”), in response to the Three Hundred Seventy-Fourth Omnibus Objection.

Attached hereto as **Exhibit 9** is a certified translation of the response [ECF No. 18234] (the “Rodríguez González Response”), filed by claimant Hermenegildo Rodríguez González (“Rodríguez González”), in response to the Three Hundred Seventy-Fourth Omnibus Objection.

Attached hereto as **Exhibit 10** is a certified translation of the response [ECF No. 18327] (the “Vargas Response”), filed by claimants Ivan Noriega Vargas, Judith Vargas Garcia, and Janitza Noriega Vargas (collectively, “Vargas”), in response to the Three Hundred Seventy-Fourth Omnibus Objection.

Attached hereto as **Exhibit 11** is a certified translation of the response [ECF No. 18376] (the “Morales Camacho Response”), filed by claimant Sergio Morales Camacho (“Morales Camacho”), in response to the Three Hundred Seventy-Fourth Omnibus Objection.

Attached hereto as **Exhibit 12** is a certified translation of the response [ECF No. 18480] (the “Rivera Collazo Response”), filed by claimant Victor L. Rivera Collazo (“Rivera Collazo”), in response to the Three Hundred Seventy-Fourth Omnibus Objection.

Attached hereto as **Exhibit 13** is a certified translation of the response [ECF No. 18507] (the “Rodríguez Carcano Response”), filed by claimant Damaris Rodríguez Carcano (“Rodríguez Carcano”), in response to the Three Hundred Seventy-Fourth Omnibus Objection.

Attached hereto as **Exhibit 14** is a certified translation of the response [ECF No. 19033] (the “Martínez Sánchez Response”), filed by claimant Gadiel Martínez Sanchez (“Martínez Sánchez”), in response to the Three Hundred Seventy-Fourth Omnibus Objection.

Attached hereto as **Exhibit 15** is a certified translation of the response [ECF No. 19046] (the “Soto Sánchez Response”), filed by claimant Eric J. Soto Sánchez (“Soto Sánchez”), in response to the Three Hundred Seventy-Fourth Omnibus Objection.

Attached hereto as **Exhibit 16** is a certified translation of the response [ECF No. 19037] (the “Berrios Castrodad Response”), filed by claimant Robert Berrios Castrodad (“Berrios Castrodad”), in response to the Three Hundred Seventy-Fourth Omnibus Objection.

Attached hereto as **Exhibit 17** is a certified translation of the response [ECF No. 19202] (the “Plaza Cruz Response”), filed by claimant Miriam E. Plaza Cruz (“Plaza Cruz”), in response to the Three Hundred Seventy-Fourth Omnibus Objection.

Attached hereto as **Exhibit 18** is a certified translation of the response [ECF No. 19203] (the “Sanchez Rivera Response”), filed by claimant Madeline Sanchez Rivera (“Sanchez Rivera”), in response to the Three Hundred Seventy-Fourth Omnibus Objection.

Attached hereto as **Exhibit 19** is a certified translation of the response [ECF No. 18098] (the “First Luna Santiago Response”), filed by claimant Julio Luna Santiago (“Luna Santiago”), to the *Three Hundred Eightieth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico, the Employees Retirement System of the Government of the Commonwealth of Puerto Rico, the Puerto Rico Highways and Transportation Authority, and the Puerto Rico Public Buildings Authority to Employee Claims Asserting Liabilities Owned by Entities that Are Not Title III Debtors* [ECF No. 17916] (the “Three Hundred Eightieth Omnibus Objection”).

Attached hereto as **Exhibit 20** is a certified translation of the response [ECF No. 19177] (the “Second Luna Santiago Response”, and together with the First Luna Santiago Response, the “Luna Santiago Responses”), filed by Luna Santiago, in response to the Three Hundred Eightieth Omnibus Objection.

Attached hereto as **Exhibit 21** is a certified translation of the response [ECF No. 18173] (the “Ortiz Castellano Response”), filed by Brenda I. Ortiz Castellano (“Ortiz Castellano”), in response to the Three Hundred Eighty-First Omnibus Objection.

Attached hereto as **Exhibit 22** is a certified translation of the response [ECF No. 18175] (the “García Miranda Response”), filed by Marlene García Miranda (“García Miranda”), in response to the Three Hundred Eighty-First Omnibus Objection.

Attached hereto as **Exhibit 23** is a certified translation of the response [ECF No. 18212] (the “Pagán Duran Response”), filed by Wilfredo Pagán Duran (“Pagán Duran”), in response to the Three Hundred Eighty-First Omnibus Objection.

Attached hereto as **Exhibit 24** is a certified translation of the response [ECF No. 18216] (the “Asencio Bernardini Response”), filed by Brenda T. Asencio Bernardini (“Asencio Bernardini”), in response to the Three Hundred Eighty-First Omnibus Objection.

Attached hereto as **Exhibit 25** is a certified translation of the response [ECF No. 18217] (the “Rodríguez Arroyo Response”), filed by José Rodríguez Arroyo (“Rodríguez Arroyo”), in response to the Three Hundred Eighty-First Omnibus Objection.

Attached hereto as **Exhibit 26** is a certified translation of the response [ECF No. 18417] (the “Castro Response”), filed by Elia E. Castro (“Castro”), in response to the Three Hundred Eighty-First Omnibus Objection.

Attached hereto as **Exhibit 27** is a certified translation of the response [ECF No. 18473] (the “Laboy Christian Response”), filed by Elena Laboy Christian (“Laboy Christian”), in response to the Three Hundred Eighty-First Omnibus Objection.

Attached hereto as **Exhibit 28** is a certified translation of the response [ECF No. 19153] (the “Lebrón Crespo Response”), filed by Gloria Maria Lebrón Crespo (“Lebrón Crespo”), in response to the Three Hundred Eighty-First Omnibus Objection.

Attached hereto as **Exhibit 29** is a certified translation of the response [ECF No. 19474] (the “Delgado García Response”), filed by Sara Wilna Delgado García (“Delgado García”), in

response to (1) the Three Hundred Eighty-First Omnibus Objection and (2) the Three Hundred Eighty-Second Omnibus Objection.

Attached hereto as **Exhibit 30** is a certified translation of the response [ECF No. 18213] (the “Martínez Quiñones Response”), filed by Lucinda Martínez Quiñones (“Martínez Quiñones”), in response to the Three Hundred Eighty-First Omnibus Objection.

Attached hereto as **Exhibit 31** is a certified translation of the response [ECF No. 18263] (the “Reyes Miranda Response”), filed by Angel R. Reyes Miranda (“Reyes Miranda”), in response to the Three Hundred Eighty-First Omnibus Objection.

Attached hereto as **Exhibit 32** is a certified translation of the response [ECF No. 18054] (the “Elizabeth Centeno Response”), filed by claimant Elizabeth Martínez Centeno (“Elizabeth Centeno”), in response to the *Three Hundred Eighty-Second Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Employee Claims Asserting Liabilities Owed by Entities that Are Not Title III Debtors* [ECF No. 17920] (the “Three Hundred Eighty-Second Omnibus Objection”).

Attached hereto as **Exhibit 33** is a certified translation of the response [ECF No. 18055] (the “Damaris Centeno Response”), filed by claimant Damaris Martínez Centeno (“Damaris Centeno”), in response to the Three Hundred Eighty-Second Omnibus Objection.

Attached hereto as **Exhibit 34** is a certified translation of the response [ECF No. 18171] (the “Rodríguez Fernández Response”), filed by claimant Aixa Edmee Rodríguez Fernández (“Rodríguez Fernández”), in response to the Three Hundred Eighty-Second Omnibus Objection.

Attached hereto as **Exhibit 35** is a certified translation of the response [ECF No. 18250] (the “Ruiz Response”), filed by claimant Ann M. Ruiz (“Ruiz”), in response to the Three Hundred Eighty-Second Omnibus Objection.

Attached hereto as **Exhibit 36** is a certified translation of the response [ECF No. 18262] (the “Velázquez Pierantoni Response”), filed by claimant Wilson Velázquez Pierantoni (“Velázquez Pierantoni”), in response to the Three Hundred Eighty-Second Omnibus Objection.

Attached hereto as **Exhibit 37** is a certified translation of the response [ECF No. 18265] (the “Santana Velázquez Response”), filed by claimant Amarilis Santana Velázquez (“Santana Velázquez”), in response to the Three Hundred Eighty-Second Omnibus Objection.

Attached hereto as **Exhibit 38** is a certified translation of the response [ECF No. 18309] (the “Ramos Pérez Response”) filed by claimant Millie Ramos Pérez (“Ramos Pérez”), in response to the Three Hundred Eighty-Second Omnibus Objection.

Attached hereto as **Exhibit 39** is a certified translation of the response [ECF No. 19344] (the “Cruz Roman Response”), filed by claimant Hilda Cruz Roman (“Cruz Roman”), in response to the Three Hundred Eighty-Second Omnibus Objection.

Attached hereto as **Exhibit 40** is a certified translation of the response [ECF No. 19429] (the “López Camacho Response”), filed by Carmen López Camacho (“López Camacho”), in response to the *Three Hundred Eighty-Third Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico to Employee Claims Asserting Liabilities Owed By Entities That Are Not Title III Debtors* [ECF No. 17922] (the “Three Hundred Eighty-Third Omnibus Objection”).

Attached hereto as **Exhibit 41** is a certified translation of the response [ECF No. 18553] (the “Maldonado Morales Response”), filed by claimant William Maldonado Morales (“Maldonado Morales”), in response to the *Three Hundred Ninety-Third Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico and Employees Retirement System of the*



*Government of the Commonwealth of Puerto Rico to Late-Filed Claims* [ECF No. 17975] (the “Three Hundred Ninety-Third Omnibus Objection”).

Attached hereto as **Exhibit 42** is a certified translation of the response [ECF No. 18169] (the “Galán Kercadó Response”), filed by claimant Carlos E. Galán Kercadó (“Galán Kercadó”), in response to the Three Hundred Ninety-Third Omnibus Objection.

Attached hereto as **Exhibit 43** is a certified translation of the response [ECF No. 18170] (the “Colón Cosme Response”), filed by claimant Janet Colón Cosme (“Colón Cosme”), in response to the Three Hundred Ninety-Third Omnibus Objection.

Attached hereto as **Exhibit 44** is a certified translation of the response [ECF No. 19420] (the “Melendez Fraguada Response”), filed by claimant Eva E. Melendez Fraguada (“Melendez Fraguada”), to the *Three Hundred Ninety-Fourth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Employee Claims Asserting Liabilities Owed by Entities that are Not Title III Debtors* [ECF No. 18958] (the “Three Hundred Ninety-Fourth Omnibus Objection”).

Attached hereto as **Exhibit 45** is a certified translation of the response [ECF No. 19409] (the “Ramirez Montes Response”), filed by claimant Evelyn Ramirez Montes (“Ramirez Montes”), to the *Three Hundred Ninety-Fifth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Claims Asserting Duplicate Liabilities* [ECF No. 18959] (the “Three Hundred Ninety-Fifth Omnibus Objection”).

Additional responses that were not filed on the docket, as well as certified translations thereof, are being submitted via notices of correspondence submitted contemporaneously herewith.

Courtesy copies of these certified translations will also be submitted to chambers in the electronic hearing binders the Oversight Board intends to submit on or before February 15, 2022 in compliance with the Adjourned Objection Hearing Procedures Order.

WHEREFORE, the Oversight Board respectfully requests that this Honorable Court take notice of the filing of these responses and certified translations in compliance with the Court's orders.

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Dated: February 2, 2022  
San Juan, Puerto Rico

Respectfully submitted,

/s/ Brian S. Rosen

Martin J. Bienenstock

Brian S. Rosen

(Admitted *Pro Hac Vice*)

**PROSKAUER ROSE LLP**

Eleven Times Square

New York, NY 10036

Tel: (212) 969-3000

Fax: (212) 969-2900

Email: mbienenstock@proskauer.com

brosen@proskauer.com

ebarak@proskauer.com

ppossinger@proskauer.com

*Attorneys for the Financial Oversight and  
Management Board as representative for the  
Debtors*

/s/ Hermann D. Bauer

Hermann D. Bauer

USDC No. 215205

Carla Carcía-Benítez

USDC No. 203708

**O'NEILL & BORGES LLC**

250 Muñoz Rivera Ave., Suite 800

San Juan, PR 00918-1813

Tel: (787) 764-8181

Fax: (787) 753-8944

Email: Hermann.bauer@oneillborges.com

*Co-Attorneys for the Financial Oversight and  
Management Board as representative for the  
Debtors*